## REMARKS

In view of the above amendments and following remarks, reconsideration and further examination are requested.

Claims 1 and 10-15 have been amended, claims 2-9 and 16-21 have been canceled, and claims 22-33 have been added.

The Examiner has rejected claims 1-5, 7-12, 14-18, 20 and 21 under 35 U.S.C. § 102(b) as being anticipated by EP '387. And, the Examiner has also rejected claims 6, 13 and 19 under 35 U.S.C. § 103(a) as being unpatentable over EP '387. These rejections are respectfully traversed and the references relied upon by the Examiner are not applicable with regard to the currently amended claims for the following reasons.

Currently amended claim 1 includes the subject matter of former claim 9, and accordingly, claim 1 recites a method of polishing and cleaning first and second substrates including *inter alia* 

secondarily cleaning said first substrate in a common second cleaning unit...and...secondarily cleaning said second substrate in said common second cleaning unit.

Thus, claim 1 requires a method wherein each of first and second substrates are secondarily cleaned in the same cleaning unit after the first and second substrates have been polished and primarily cleaned in respective polishing and cleaning units. Such a method is not taught nor suggested by EP '387.

In this regard, EP '387 discloses polishing a first substrate in a first polishing unit (1a), cleaning the first substrate in a first (7a) of two first cleaning units, and cleaning the first substrate in a first (8a) of two second cleaning units (see solid arrows in FIG. 4B). EP '387 also discloses polishing a second substrate in a second polishing unit (1b), cleaning the second substrate in a second (7b) of two first cleaning units, and cleaning the second substrate in a second cleaning units (see dotted arrows in FIG. 4B).

Thus, while EP '387 does disclose polishing and primarily cleaning first and second substrates in respective polishing and cleaning units, this reference also discloses secondarily cleaning the first and second substrates in respective second cleaning units. Accordingly, EP '387 does not disclose secondarily cleaning the first substrate and the second substrate in a single or common second cleaning unit as required by claim 1.

Thus, claim 1 is not anticipated by EP '387, whereby claims 1, 10-15 and 22-33 are allowable.

If the Examiner continues to reject the claims, then the Examiner is respectfully requested to specifically explain how each claim limitation is being read on EP '387.

In view of the above amendments and remarks, it is respectfully submitted that the present application is in condition for allowance and an early Notice of Allowance is earnestly solicited.

If after reviewing this Amendment, the Examiner believes that any issues remain which must be resolved before the application can be passed to issue, the Examiner is invited to contact the Applicants' undersigned representative by telephone to resolve such issues.

Respectfully submitted,

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